

January 21, 2020

Via CM/ECF

Honorable David G. Campbell
United State Distric Court
Sandra Day O'Connor U.S. Courthouse, Suite 522
401 West Washington Street, SPC 58
Phoenix, AZ 85003

**RE: Bard IVC Filters Products Liability Litigation
(Collins, Darleen Sue, CV-19-04088-PHX-DGC)
(Fatony, Richard Wayne, CV-19-04252-PHX-DGC)
(Perry, Russell Seward, CV-18-02831-PHX-DGC)
(Walker, Maurice, CV-18-02699-PHX-DGC)**

Your Honor,

My office would like to bring it to the Court's attention that our clients Darleen Collins, Richard Fatony, Russell Seward, and Maurice Walker. These clients were listed on Exhibit G to the Joint Status Report (Doc. 21406), which identified direct-filed cases that had not been served on Defendants.

This firm reached out to Richard North on January 9th and January 20th requesting that counsel consent to moving these cases to Exhibit F. Mr. North has not responded as to date. In addition, Plaintiff Leadership Counsel circulated the final draft of exhibits on January 16, 2020. On this draft, our clients are not correctly listed on Amended Exhibit G because these Plaintiffs have served Defendants.

We respectfully request that the Court allow an amendment to be made to the Joint Status Report that would list our clients on Amended Exhibit F.

Very truly yours,
FEARS | NACHAWATI, PLLC



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RE: Bard IVC Filters Products Liability Litigation
(Babcock, Kristin, CV-18-00407-PHX-DGC)
(Black-Goodrow, Sherry Lynn, CV-18-00406-PHX-DGC)
(Colucci, Dominic S, CV-18-04924-PHX-DGC)
(Garza, Olga LQ, CV-19-02639-PHX-DGC)
(George, Vivian Esther, CV-18-02306-PHX-DGC)
(Gray, Eboni, CV-19-04041-PHX-DGC)
(Hartney, Christopher, CV-19-02322-PHX-DGC)
(Mayberry, William, CV-19-04089-PHX-DGC)
(Pruitt, Jessie, CV-19-03869-PHX-DGC)
(Santana, Alejandro G, CV-18-02264-PHX-DGC)
(Stafford, Scott, CV-19-04079-PHX-DGC)
(Walton, Edward, CV-19-02290-PHX-DGC)
(Ward, Tarvey, CV-19-03864-PHX-DGC)

Your Honor,

My office would like to bring it to the Court's attention that our clients Kristin Babcock, Sherry Goodrow, Dominic Colucci, Olga Garza, Vivian George, Eboni Gray, Christopher Hartney, William Mayberry, Jessie Pruitt, Alejandro Santana, Scott Stafford, Edward Walton, Tarvey Ward. These clients were listed on Exhibit H to the Joint Status Report (Doc. 21406), which identified plaintiffs for whom defense counsel had not received, or had received an incomplete, Plaintiff Profile Form ("PPF").

This firm reached out to Richard North on January 20th requesting that counsel consent to moving these cases to Exhibit F. Mr. North has not responded as to date. In addition, Plaintiff Leadership Counsel circulated the final draft of exhibits on January 16, 2020. On this draft, our clients are not correctly listed on Amended Exhibit B-F (Exhibit H) because all alleged deficiencies with their PPFs have been corrected.

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We respectfully request that the Court allow an amendment to be made to the Joint Status Report that would list our clients on Amended Exhibit F.

Very truly yours,
FEARS | NACHAWATI, PLLC

A handwritten signature in black ink, appearing to read "A. C. Furness", with a stylized flourish at the end.

Arati C. Furness
Attorney at Law